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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK ANTHONY DUNNE; AUDREY)	Case No. 3:10-cv-05636-EMC
GRACE FITZSIMMONS,)	
)	STIPULATION TO EXTEND DATES
Plaintiffs,)	AND [PROPOSED] ORDER
)	
vs.)	
)	
DEPARTMENT OF HOMELAND)	
SECURITY; ATTORNEY GENERAL)	
ERIC H. HOLDER, JR.; IMMIGRATION)	
AND CUSTOMS ENFORCEMENT;)	
TIMOTHY S. AITKEN,)	
)	
Defendants.)	

Plaintiffs, by and through his attorneys of record, and Defendants, by and through their attorneys of record, stipulate to the following:

1. Plaintiffs filed a complaint in this action on December 13, 2010. Plaintiffs perfected service on January 21, 2011. Without an extension, Defendants' deadline to answer or respond is March 22, 2011.
2. The Defendants are in the process of gathering information and documents, and determining their position on this case, and require additional time to complete these tasks before filing an answer or responsive pleadings.
3. Therefore, the parties hereby respectfully request this Court to order a thirty-day

STIPULATION FOR EXTENSION OF TIME
Case No. C 10-5636

1 extension of time within which the Defendants must serve its response in the above-entitled
2 action. Defendants will file their response on or before April 21, 2011.

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4 Respectfully submitted,

5 Dated: March 22, 2011

6 s/ Katherine E.M. Goettel
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12 Dated: March 22, 2011

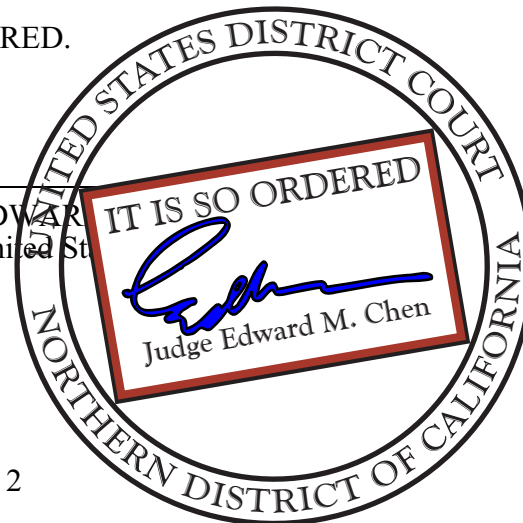
13 s/ James M. Byrne
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17 Email: jbyrne@byrne-law.net

18
19 **ORDER**

20
21 Pursuant to stipulation, IT IS SO ORDERED.

22
23 Date: March 22, 2011

24 EDWARD M. CHEN
United States District Court



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27 STIPULATION FOR EXTENSION OF TIME
28 Case No. C 10-5636

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify this document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

Dated: March 22, 2011

/s/ Katherine E.M. Goettel
KATHERINE E.M. GOETTEL